## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

Civil Action No. 1:22-cv-00187-LJV-JJM

SKYRYSE, INC., ROBERT ALIN PILKINGTON, MISOOK KIM, and DOES NOS. 1-50.

Defendants.

## NOTICE OF MOTION TO COMPEL TRADE SECRET IDENTIFICATION

PLEASE TAKE NOTICE THAT, upon the accompanying Motion to Compel Trade Secret Identification, Memorandum of Law, and Declaration of Gabriel S. Gross, together with all exhibits, Defendant Skyryse Inc. by and through its undersigned counsel, Latham & Watkins LLP, hereby moves this Court for an order requiring plaintiff Moog Inc. to immediately:

- 1. answer in full Skyryse's Interrogatory No. 1 calling for Moog to identify with particularity every alleged trade secret it intends to assert in this action including through a narrative response and not solely by invoking Rule 33(d); and
- supplement its responses to Skyryse's Interrogatory Nos. 2-9 calling for information regarding the trade secrets Moog discloses in response to Interrogatory No. 1.

In accordance with Local Rule 7(a)(1), Skyryse reserves the right to file and serve reply papers. Skyryse respectfully requests the Court hear oral argument on Skyryse's Motion during the conference already scheduled for July 15, 2022, or at the Court's earliest convenience, and that opposition and reply briefing be scheduled accordingly in advance of the July 15 conference.

Dated: June 21, 2022 /s/ Gabriel S. Gross

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